

Exhibit 30

PLAINTIFF HARFORD COUNTY BOARD OF EDUCATION OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT (HARFORD) (SD MSJ NO. 6)

Case No.: 4:22-md-03047-YGR

MDL No. 3047

Member Case No.: 4:23-cv-03065-YGR

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

:
IN RE: SOCIAL MEDIA : Case No.
ADOLESCENT ADDICTION/ : 4:22-MD-03047-YGR
PERSONAL INJURY PRODUCTS :
LIABILITY LITIGATION, : MDL No. 3047

:

:
This Document Relates to: :
Board of Education of :
Harford County v. Meta :
Platforms Inc., et al. :
:
Case No. 4:23-cv-03065 :

:

Friday, March 14, 2025

30(b)(1) video deposition of ANDREW
MOORE, taken at the Offices of the Harford County
Public Schools Central Administration Building,
located at 102 South Hickory Avenue, Bel Air,
Maryland, beginning at 9:37 a.m., EST, before
Ryan K. Black, Registered Professional Reporter,
Certified Livenote Reporter and Notary Public
in and for the State of Maryland.

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1 THE VIDEOGRAPHER: We are on the record
2 at 9:37.

3 * * *

4 Whereupon --

5 ANDREW MOORE,
6 called to testify, having been previously first
7 duly sworn affirmed, was examined and testified
8 as follows:

9 * * *

10 30(b)(1) EXAMINATION

11 BY MR. KEYES:

12 Q. Good morning, Mr. Moore. Would you
13 please introduce yourself to the jury?

14 A. Andrew Moore, Director of Technology
15 Harford County Public Schools.

16 Q. Are you currently employed?

17 A. Yes, sir.

18 Q. For how long have you been employed by
19 Harford County Public Schools?

20 A. Since February of 2000.

21 Q. And have you held any other positions
22 with Harford County Public Schools since 2000?

23 A. I have not.

24 Q. Are you aware that you're under oath
25 today?

1 A. Yes, sir.

2 Q. Have you ever given testimony under oath
3 before?

4 A. No, sir.

5 Q. Either in a deposition or a trial or
6 some other proceeding?

7 A. No, sir.

8 Q. Have you ever served as a teacher either
9 in Harford County Public Schools or elsewhere?

10 A. No, sir.

11 Q. Have you ever served as a school
12 counselor either in Harford County Public Schools
13 or elsewhere?

14 A. No, sir.

15 Q. Have you ever served as a mental health
16 counselor either for Harford County Public
17 Schools or elsewhere?

18 A. No, sir.

19 Q. Have you ever worked in school finance
20 either in Harford County Public Schools or
21 elsewhere?

22 A. No, sir.

23 Q. Have you ever served as an administrator
24 outside the IT space for Harford County Public
25 Schools or elsewhere?

1 A. No, sir.

2 Q. Does Harford County Public Schools have
3 a social media account of any type?

4 A. Yes, sir.

5 Q. What social media account or accounts
6 does it have?

7 A. I believe Facebook, Twitter, are the two
8 that come to mind.

9 Q. Are -- are you aware of any other social
10 media account that Harford County Public Schools
11 has?

12 A. I do not recall.

13 Q. Okay. Are you involved in any way in
14 creating content for posting to Facebook, Twitter
15 or any other social media accounts?

16 A. I am not.

17 Q. Are you involved at all in posting
18 content on Harford County Public Schools'
19 Facebook, Twitter or other social media account?

20 A. I am not.

21 Q. Are you involved at all in managing
22 Harford County Public Schools' Facebook, Twitter
23 or other social media accounts?

24 A. I am not.

25 Q. For how long has Harford County Public

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1 Schools had a Facebook account?

2 A. I do not recall.

3 Q. Were you involved at all in the decision
4 whether to launch such an account?

5 A. No, sir.

6 Q. For how long has Harford County Public
7 Schools had a Twitter account?

8 A. I do not recall.

9 Q. Were you involved at all in the decision
10 whether to launch such an account on Twitter?

11 A. No, sir.

12 Q. Are you involved in any way in any
13 social media account for any specific school in
14 Harford County?

15 A. No, sir.

16 Q. Are you involved in any way in any
17 social media account for any particular club,
18 team, affinity group or organization at any
19 Harford County Public School?

20 MR. LEGG: Objection to form.

21 THE WITNESS: No, sir.

22 BY MR. KEYES:

23 Q. Have you ever communicated with any of
24 the defendants -- Google, YouTube, Meta, Snap or
25 TikTok -- to request that any feature on their

1 platform be modified?

2 MR. LEGG: Objection to form.

3 THE WITNESS: No, sir.

4 BY MR. KEYES:

5 Q. Have you ever communicated with any of
6 these companies to request that any feature on
7 their platform be discontinued?

8 MR. LEGG: Objection to form.

9 THE WITNESS: No, sir.

10 BY MR. KEYES:

11 Q. Do you have any data on students' use of
12 social media in Harford County Public Schools?

13 A. I do not.

14 Q. Do you have any data on the mental
15 health condition of students in Harford County
16 Public Schools?

17 A. I do not.

18 Q. Do you have any data on counseling or
19 treatment of the mental health of students in
20 Harford County Public Schools?

21 A. I do not.

22 Q. Do you have any data on Harford's
23 expenditures on student use of social media?

24 A. I do not.

25 Q. Or the mentality health condition of any

1 students?

2 A. I do not.

3 Q. Or any counseling or treatment of
4 students' mental health in Harford County?

5 A. I do not.

6 Q. Has Harford County Public Schools ever
7 purchased Yondr pouches?

8 A. I'm not aware of any.

9 Q. Do you know what Yondr pouches are?

10 A. I do not.

11 Q. Have you ever heard of magnetic pouches
12 that can be used for students to put their phone
13 in the pouch, seal it up, so they can't use it
14 during the instructional school day?

15 A. No.

16 Q. Okay. Have you ever had any
17 conversation with anyone in Harford County
18 Public Schools about using any such pouch?

19 A. No, sir.

20 Q. Okay. Harford County Public Schools has
21 used different services as its internet content
22 filter over the years; is that correct?

23 A. Yes.

24 Q. And that filter may have changed between
25 whether it's for students or staff?

1 A. Yes.

2 Q. Am I correct in understanding that the
3 two internet content filters that Harford County
4 Public Schools has used for staff over the years
5 are Check Point and Palo Alto?

6 A. Correct.

7 Q. And am I correct in understanding that
8 the internet content filters that Harford County
9 Public Schools has used for students have been
10 Palo Alto, Umbrella and Cisco Securely?

11 A. Yes.

12 Q. Okay. Currently, does Harford County
13 Public Schools block social media using its
14 internet content filter?

15 MR. LEGG: Objection; form.

16 THE WITNESS: To which Harford County
17 School community are you referring to?

18 BY MR. KEYES:

19 Q. Well, tell me what the different
20 communities are.

21 A. Well, students or staff.

22 Q. Students or staff?

23 Okay. When you refer to "Harford
24 communities," is there any other community
25 besides staff or student?

1 A. No.

2 I just wanted the clarification of who
3 you're referring to.

4 Q. Okay. So does Harford County Public
5 Schools currently block social media for staff?

6 A. No.

7 Q. Has it blocked social media for staff in
8 the past?

9 A. Yes.

10 Q. What has it blocked in the past?

11 A. All social media except Facebook,
12 Twitter. School administrators -- that would be
13 principals and assistant principals -- have
14 access to Instagram.

15 Q. Anything else?

16 A. No, sir.

17 Q. Okay. So in the past, principals have
18 had access to Instagram, Facebook and Twitter?

19 A. Yes.

20 Q. And in the past, other staff have had
21 access to Facebook and Twitter?

22 A. Correct.

23 Q. But, otherwise, social media has been
24 blocked for principals and staff?

25 A. Correct.

1 Q. But did I understand you to say that,
2 currently, no social media is blocked?

3 A. I did not say that.

4 Q. Okay. I must have misunderstood.

5 Okay. So has it always been the
6 case, then, that principals have had access to
7 Instagram, Facebook and Twitter, --

8 MR. LEGG: Objection to form.

9 BY MR. KEYES:

10 Q. -- at least during your tenure?

11 A. Since 2013.

12 Q. Okay. Since 2013, principals in
13 Harford County Public Schools have had access
14 to Instagram, Facebook and Twitter?

15 A. To my knowledge.

16 Q. And since 2013, other staff besides
17 principals in Har -- Harford County Public
18 Schools have had access to Facebook and Twitter?

19 A. Correct.

20 Q. Okay. So since 2013, have any staff,
21 including principals, had access to TikTok?

22 A. No.

23 Q. At any time since 2013 have staff,
24 including principals, had access to Snap?

25 A. No.

1 Q. Okay. So when TikTok, Snap, or other
2 social media -- besides Twitter, Facebook or
3 Instagram -- have been blocked, has that been
4 blocked using Harford County Public Schools
5 internet content filter?

6 A. Yes.

7 Q. Okay. Whether that be Check Point,
8 Palo Alto, Umbrella or Cisco Securely?

9 A. Yes.

10 Q. That's for staff.

11 Currently, does Harford County Public
12 Schools block social media for students?

13 A. Yes.

14 Q. Are there any exceptions?

15 A. Do you consider YouTube social media?

16 Q. I do not. But for purposes of my
17 question, why don't I -- why don't I focus on
18 particular companies.

19 Okay. For students, does Harford County
20 Public Schools internet content filter block
21 access to Facebook?

22 A. Yes.

23 Q. Instagram?

24 A. Yes.

25 Q. TikTok?

1 A. Yes.

2 Q. Snap?

3 A. Yes.

4 Q. Okay.

5 A. For students.

6 Q. For students?

7 A. Yeah.

8 Q. Has Harford County Public Schools always
9 blocked student access to Facebook, Instagram,
10 TikTok and Snap?

11 A. Yes.

12 Q. And is that student access blocked by
13 the internet content filter?

14 A. Yes.

15 Q. Separate from the internet content
16 filter that Harford County Public Schools uses,
17 is there any other mechanism that the sys -- the
18 system uses to block access to social media?

19 A. No.

20 Q. Or any other internet -- internet
21 content besides social media?

22 A. Restate your question again, please.

23 Q. Sure. We've -- I've asked you about
24 internet content filter and what it blocks.

25 A. Mm-hmm.

1 Q. I'm trying to understand -- separate
2 from that internet content filter -- is there
3 any other mechanism that Harford County Public
4 Schools uses to block student access to content
5 on the internet?

6 A. No.

7 Q. What is your understanding of Harford
8 County Public Schools' current policy regarding
9 use of personal devices on school grounds?

10 A. Students --

11 MR. LEGG: Objection; form.

12 THE WITNESS: Students or staff?

13 BY MR. KEYES:

14 Q. Students.

15 A. There is a recent policy -- I could
16 not state it verbatim -- of when students are
17 permitted to have a personal device.

18 Q. Were -- were you involved in adopting
19 that policy?

20 A. I was not.

21 Q. Were you involved in drafting it?

22 A. I was not.

23 (Moore 30(b)(1) Exhibit No. 1, a
24 document Bates-stamped HCPS_00122261 through
25 122266, was introduced.)

1 BY MR. KEYES:

2 Q. I'm handing you what has been marked as
3 Moore Exhibit 1.

4 This was produced with the Bates Numbers
5 HCPS_00122261 through 122266.

6 Tell me when you've read Moore
7 Exhibit 1.

8 A. (Reviews document.)

9 Q. Okay. You've reviewed Moore Exhibit 1?

10 A. Yes, sir.

11 Q. Is this the policy you were just
12 referencing? You said there was a recent policy?

13 A. There is a cell phone policy, I
14 believe, --

15 Q. Oh.

16 A. -- that is separate from this.

17 Q. Okay. What is Moore Exhibit 1?

18 A. This is a policy entitled Portable
19 Communication Devices.

20 Q. Okay. And it -- it reflects that it was
21 recently amended starting in March 18th, 2024?

22 A. Correct.

23 Q. Have you seen Moore Exhibit 1 before?

24 A. I have.

25 Q. Okay. Were you involved in drafting

1 this policy?

2 A. No.

3 Q. Were you involved in discussions within
4 Harford County Public Schools whether to adopt
5 this policy?

6 A. No.

7 Q. Does this document indicate that it was
8 adopted?

9 A. It does.

10 Q. It was adopted by the Board?

11 A. Yes, sir.

12 Q. And that's the Board of Education of
13 Harford County, as reflected on Page 506?

14 A. Correct.

15 Q. Okay. What was the policy regarding
16 students for portable communication devices
17 before Moore Exhibit 1 was adopted?

18 A. I have no recollection.

19 Q. Okay. Does this policy, as you
20 understand it, apply to just students, or does
21 it also apply to staff?

22 A. As I read it, just students.

23 Q. Okay. What is your understanding of
24 the current policy for staff regarding the
25 use of personal devices on school grounds?

1 A. I do not believe there is one.

2 Q. Okay. There's no written policy?

3 A. Correct.

4 Q. Are you aware of any unwritten policy
5 regarding staff use of personal devices on school
6 grounds?

7 MR. LEGG: Objection to form.

8 THE WITNESS: No.

9 (Moore 30(b)(1) Exhibit No. 2, a
10 document Bates-stamped HCPS_00132081 through
11 132085, was introduced.)

12 BY MR. KEYES:

13 Q. I'm showing you what has been marked as
14 Moore Exhibit 2.

15 This was produced with the Bates Numbers
16 HCPS_00132081 through 132085. Could you tell me
17 when you've reviewed this exhibit?

18 A. (Reviews document.)

19 I have completed.

20 Q. Okay. You've reviewed Moore Exhibit 2?

21 A. Yes, sir.

22 Q. And this is the Responsible Use Policy
23 for Harford County Public Schools?

24 A. It is not.

25 Q. It is not? What is it?

1 A. It's a Responsible Use Procedure.

2 Q. Okay. What's the difference between
3 policy and procedure?

4 A. Policy is Board-adopted. Procedures are
5 the underlying document typically in support of a
6 policy.

7 Q. Okay. So is this the Harford County
8 Public Schools' procedure for implementing a
9 policy regarding the use of -- of devices or
10 resources?

11 A. It is not.

12 Q. Okay. What is it?

13 A. It is a procedure to outline the
14 responsible use of a device.

15 Q. Okay. What devices does it govern
16 regarding responsible use?

17 A. HCPS-owned devices.

18 Q. Okay. So would that include the --
19 the Dell Chromebooks that are distributed to
20 students?

21 A. Correct.

22 Q. Okay. Does it -- are you familiar
23 with how Harford County Public Schools' staff
24 implements or enforces the procedures in this
25 exhibit?

1 A. I am aware of how we track the
2 professional development associated with this
3 procedure.

4 Q. Okay. And can you tell me what that is?

5 A. Yes. So we have a training module that
6 is built to reflect this procedure. We require
7 all staff to take the training module every year.
8 If they do not complete the module by the
9 specified time, their network account is
10 disabled.

11 Q. What is that specified time?

12 A. I believe we give them 60 days.

13 Q. Okay. Were you involved in the drafting
14 of this procedure?

15 A. I may have had some input to this.

16 Q. Could you turn to Page 5 of 5 in Moore
17 Exhibit 2?

18 There's a section titled "Responsibility
19 for Procedure, Maintenance and References." And
20 then there's a box for "Last Editor/Drafter
21 Name." It lists you. Do you see that?

22 A. Yes.

23 Q. And it lists your position as Director
24 of Information and Technology.

25 A. Yes.

1 Q. Does this indicate to you whether you
2 had any role in drafting or editing --

3 A. Yes.

4 Q. -- this procedure?

5 Okay. What was your role, then, in
6 drafting or editing this procedure?

7 A. I do not recall specifics other than I
8 was probably asked to give certain input where
9 there was more technical terms used.

10 Q. Anything else?

11 A. I don't recall, sir.

12 Q. Did you approve of Harford County Public
13 Schools adopting this procedure?

14 A. I most likely did.

15 Q. Do you recall having any objection to
16 the procedure or any of its contents?

17 A. Oh, no. None at all.

18 Q. Okay. Would you turn to Page 3 of 5 in
19 this exhibit?

20 It shows there's a Section B. Do you
21 see Section B's heading?

22 A. Yes, sir.

23 Q. It says, "HCPS community use of personal
24 telecommunication devices." Do you see that?

25 A. Yes.

1 Q. And if you look at the prior page,
2 Section A is, "HCPS community use of HCPS
3 telecommunications devices or resources."

4 A. Yes, sir.

5 Q. Does this refresh your recollection
6 that this procedure applies both to Harford
7 County Public Schools-issued devices as well as
8 Harford County Public Schools community use of
9 personal devices?

10 A. There -- it -- it does cover the use of
11 personal devices.

12 Q. Okay. So this procedure is not just for
13 school-issued devices. It's also for personal
14 devices that are used by staff or students on
15 school grounds?

16 A. As a responsible use.

17 Q. As a responsible use; is that correct?

18 A. Yes.

19 Q. Okay. So regarding Section B, which
20 is addressing the use by Harford County Public
21 Schools community of personal telecommunications
22 devices, that reference to the community is both
23 staff and students, --

24 A. Yes.

25 Q. -- correct?

1 Okay. And it says, "The use of personal
2 telecommunications devices to support education
3 is a privilege." Do you see that language?

4 A. Yes, sir.

5 Q. Does -- what does that mean to you as
6 the person involved in drafting and editing and
7 supervising the training of people in this
8 procedure?

9 MR. LEGG: Objection to form and
10 foundation.

11 BY MR. KEYES:

12 Q. You can answer.

13 A. I do not recall writing that specific
14 statement. I mean, it -- I think it speaks to
15 exactly how it's said -- that it's not a right;
16 it's a privilege.

17 Q. Not a right, a privilege.

18 And use of personal telecommunications
19 devices on school grounds is not -- is not -- is
20 not essential. It's a choice by -- to -- to
21 allow that by Harford County Public Schools.

22 A. Within para --

23 MR. LEGG: Objection to form.

24 THE WITNESS: Within parameters.

25 BY MR. KEYES:

1 Q. What do you mean "within parameters"?

2 A. Well, if you refer back to Moore
3 Exhibit 1, there -- there is reference to the
4 use of portable communication devices in proper
5 places of the educational environment.

6 Q. So you're referring to the parameters or
7 restrictions that Harford County Public Schools
8 has imposed on the use of personal devices?

9 A. Yes.

10 Q. Okay.

11 But the decision to allow personal
12 devices on school property in the first place
13 was a Harford County Public Schools decision?

14 A. Correct.

15 Q. And it was a decision recognizing that
16 allowing personal devices is a privilege, not a
17 right, on the students' part, right?

18 A. Yes.

19 Q. And it's not an essential necessity,
20 but a choice, on Harford County Public Schools'
21 part, --

22 MR. LEGG: Objection to form and
23 foundation.

24 BY MR. KEYES:

25 Q. -- right?

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1 A. Yes.

2 Q. Okay. There's a number of paragraphs
3 stating what members of the Harford County Public
4 Schools community agreed to follow with respect
5 to the use of personal telecommunications devices
6 on school grounds, correct?

7 A. Correct.

8 Q. I'd ask you to look at Number 6.

9 It says, "Use the HCPS wireless (Wi-Fi)
10 connection in order to comply with the use of
11 content filters. The HCPS will not bypass the
12 network restriction by using an external
13 network."

14 Did I read that correctly?

15 A. Yes, sir.

16 Q. Okay. Does Harford County Public
17 Schools take any steps to monitor whether
18 students and staff are complying with this
19 particular requirement?

20 A. We do not monitor compliance.

21 Q. Okay. Does Harford County Public
22 Schools take any steps to enforce this particular
23 requirement when violations come to its
24 attention?

25 A. Could you restate that again, please?

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1 Q. Sure. Sure. Does Harford County Public
2 Schools take any steps to enforce this particular
3 requirement when violations come to its
4 attention.

5 A. Not --

6 MR. LEGG: Objection to form and
7 foundation.

8 THE WITNESS: Not -- not that I'm aware
9 of the -- the enforcement of it.

10 BY MR. KEYES:

11 Q. Okay. So if -- if a teacher, or
12 some other staff member, learns of a student
13 attempting to bypass the Harford County Public
14 Schools' network, one way or another, what are
15 they supposed to do under this procedure that's
16 adopted by Harford County Public Schools?

17 MR. LEGG: Objection to form.

18 THE WITNESS: I would say what they do
19 is outside of what this procedure's telling them.

20 BY MR. KEYES:

21 Q. Okay. How so?

22 A. Well, I don't see anything in here that
23 states an action that should be taken by someone
24 that's trying to, as you used the term,
25 "circumvent."

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1 Q. Okay. Well, I'm trying to understand,
2 from -- from your perspective, there is a
3 requirement that the community not bypass the
4 Harford County Public Schools network by using
5 an external network, correct?

6 A. Correct.

7 Q. Okay. That requirement is reflected in
8 Moore Exhibit 2?

9 A. Yes.

10 Q. So I want to understand, from your
11 perspective, if a teacher finds a student
12 violating that requirement, what are they
13 supposed to do?

14 MR. LEGG: Objection; form.

15 THE WITNESS: I'm not on the discipline
16 side, sir. I do not what their protocol is.

17 BY MR. KEYES:

18 Q. Okay. And so you -- you've not been
19 involved in the past in instances of teachers
20 reporting that a student has violated this
21 requirement by trying to circumvent the
22 Harford County Public Schools network?

23 A. We have been notified of a potential
24 incident --

25 Q. Okay.

1 A. -- for us to investigate.

2 Q. How many times has that happened in your
3 tenure?

4 A. I have no recollection, sir.

5 Q. Can you give me an estimate?

6 A. No.

7 Q. Okay. When those have come to your
8 attention, have you done anything?

9 A. Yes.

10 Q. What have you or your staff done in
11 response?

12 A. We will review our logs to see if, in
13 fact, that we can place an individual by their
14 network login accessing a certain site.

15 Q. Okay. And how do you do that?

16 A. We re -- review our firewall logs.

17 Q. Okay. And if you find that a student
18 has attempted to circumvent the Harford County
19 Public Schools network based on your review of
20 the firewall log, do you take any action?

21 A. I report back to what we found.

22 Q. And to whom do you report that?

23 A. Generally, it's the principal of the
24 building that's requested it.

25 Q. Okay. And are you familiar with what

1 steps, if any, the principal has taken regarding
2 the student's violation of the requirement?

3 A. No.

4 (Moore 30(b)(1) Exhibit No. 3, a
5 document Bates-stamped HCPS_00412083 through
6 412087, was introduced.)

7 BY MR. MOORE:

8 Q. I'm showing you what has been marked as
9 Moore Exhibit 3.

10 This was produced to us with the Bates
11 Numbers HCPS_00412083 through 412087.

12 A. (Reviews document.)

13 Q. Tell me when you've reviewed this
14 exhibit.

15 A. I've reviewed it.

16 Q. Okay. What is Moore Exhibit 3?

17 A. It appears to be a first draft of the
18 Responsible Use Procedure.

19 Q. And what indicates to you that this is a
20 draft?

21 A. Well, it is -- it appears that it was
22 never adopt -- well, it does say "adopted" here
23 on Page 5; however, I do not see a signature of
24 the then-superintendent, so I would question
25 that.

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1 Q. Okay. And then you see that Exhibit 2,
2 which was the adopted policy, is also dated
3 February 2nd, 2015?

4 A. Yes, sir.

5 Q. Okay. So is it your understanding that
6 Exhibit 3 is the draft that was not adopted and
7 Exhibit 2 is the final version that was adopted?

8 A. I believe so.

9 Q. Okay. And do you know, sitting here,
10 what the differences are between the draft and
11 the final?

12 A. This is more of a declaration of what
13 you will and not do. And I believe the final
14 decision -- and I do not recall the -- the
15 specifics of that decision -- was to put it in
16 the form of what was adopted.

17 Q. Do you have any other recollection of
18 differences between the draft that's Exhibit 3
19 and the final that's Exhibit 2?

20 A. Other than what I can read here, sir.

21 (Moore 30(b)(1) Exhibit No. 4, Mr.
22 Moore's résumé, was introduced.)

23 BY MR. KEYES:

24 Q. Okay. Showing you what has been marked
25 as Moore Exhibit 4.

1 MR. LEGG: Thank you.

2 BY MR. KEYES:

3 Q. This appears to be a résumé for you?

4 A. Yes, sir.

5 Q. Can you confirm this is your résumé?

6 A. Yes, sir.

7 Q. Did you prepare it?

8 A. Yes, sir.

9 Q. Is it accurate?

10 A. Yes, sir.

11 Q. Is it complete?

12 A. Well, in 25 -- or 40 years, it would be
13 a lot longer, but, yes, it was -- it is complete.

14 Q. Anything that you would flag for
15 something that is important that should be
16 added to the résumé, if you had the chance?

17 A. Not necessarily, no.

18 Q. Okay.

19 MR. KEYES: Can we take a five-minute
20 break?

21 MR. LEGG: Sure.

22 THE VIDEOGRAPHER: Stand by.

23 We are off the record at 10:12.

24 (Recess taken.)

25 THE VIDEOGRAPHER: We are on the record

1 at 10:24.

2 (Moore 30(b)(1) Exhibit No. 5, a
3 document Bates-stamped HCPS_00411565 through
4 411566, was introduced.)

5 BY MR. KEYES:

6 Q. Mr. Moore, I'm handing you what has been
7 marked as Moore Exhibit 5.

8 This was produced to us with the Bates
9 Numbers HCPS_00411565 through 411566. It's a
10 series of two emails between you and Jean [sic]
11 Seashole on June 6th and June 7th of 2022.

12 Tell me when you've read the -- the
13 emails in this exhibit.

14 A. (Reviews document.)

15 I have.

16 Q. Okay. The first email is from
17 Jean -- Jenn Seashole.

18 A. Mm-hmm.

19 Q. Do you know what her position is?

20 A. I do not. So this email -- the -- the
21 originating email from Jenn -- is asking all of
22 the CIOs across the State of Maryland a question.
23 She is posing the question -- she -- well,
24 her title is right there, Supervisor of
25 Information Services Carroll County Public

1 Schools. And, quite frankly, this was her
2 collecting information as to what other
3 districts are doing.

4 Q. Regarding YouTube?

5 A. It appears so, yes.

6 Q. Okay. And separate from the fact that
7 her title is listed in -- in the signature block
8 of her email, do you know who --

9 A. No.

10 Q. -- she is?

11 A. No.

12 Q. Okay. Do you remember this email
13 exchange?

14 A. No.

15 Q. You respond to her email on June 7th,
16 2022, correct?

17 A. I do.

18 Q. And you say, quote, "Harford opened
19 YouTube for all grades. We forced restricted
20 mode for both Google and YouTube."

21 Did I read that correctly?

22 A. You did.

23 Q. Okay.

24 A. It was an error.

25 Q. Okay. What's the error there?

1 A. Oh, I misspoke.

2 Q. How so?

3 A. We do not open YouTube for all grades.

4 Q. Okay. You open it only for grade 3 --

5 A. Through 12.

6 Q. -- through grade 12?

7 A. That's correct.

8 Q. Okay. And is it accurate to say
9 that, at least in June of 2022, Harford County
10 Public Schools put all grades 3 through 12 in
11 restricted mode?

12 A. That's what I'm stating here. That may
13 not have been the case.

14 Q. Okay.

15 A. I'm -- I'm -- I mean, obviously, I
16 was -- I was wrong in my statement here.

17 Q. Well, you te -- I believe you had
18 testified earlier that there were different modes
19 of restriction.

20 A. That is correct.

21 Q. And that there was a different mode of
22 restriction for grades 6 through 12.

23 A. That's correct.

24 Q. Did I get that right?

25 A. Yeah. That's correct.

1 Q. And I believe you described that
2 restricted mode as being Modified Mode.

3 A. There is the Strict Restricted
4 -- there's Strict Restriction and Modified
5 Restriction. So, yes, Modified is grades six
6 through 12.

7 Q. And Strict Restriction is grades 3
8 through 5?

9 A. That's correct.

10 Q. Okay. And so here when you say we
11 re -- forced Restricted Mode, that is describing
12 both Modified Restricted and Strict Restricted?

13 A. Yeah. I was just summarizing it, yes.

14 Q. Okay. So do you view this document as
15 consistent with your other testimony that YouTube
16 was made available to Harford County Public
17 Schools on its devices and on its network for
18 grades 3 through 12 -- grades 3, 4 and 5 in
19 Strict Restricted Mode, and grades 6 through 12
20 in Moderate Restricted Mode?

21 A. Yes.

22 MR. LEGG: Objection to form.

23 BY MR. KEYES:

24 Q. Okay. Turning your attention to
25 Moore Exhibit 5, you then say, quote, "We have a

1 parent consent/release document we collect at the
2 beginning of each school year."

3 Did I read that correctly?

4 A. Yes, sir.

5 Q. Is that something you have done each
6 year since Harford County Public Schools decided
7 to make YouTube available to students?

8 A. Yes. I could not tell you when we
9 started actually implementing a parent consent
10 form.

11 Q. Okay. Was there a period of time
12 when Harford County Public Schools made YouTube
13 available to students before it had obtained
14 parental consent or release in a -- in a
15 document?

16 A. Not that I'm aware of.

17 Q. Okay. Is it your best understanding
18 that ever since Harford County Public Schools
19 decided to make YouTube available to students,
20 either on school grounds or on the school
21 network, that it obtained parental consent?

22 A. Yes.

23 MR. LEGG: Objection to form.

24 BY MR. KEYES:

25 Q. And did any parents complain to you

1 about Harford County Public Schools making
2 YouTube available to students?

3 A. I can't recall.

4 Q. Okay. Are you aware of any parents
5 complaining to anyone else in Harford County
6 Public Schools about making YouTube available to
7 students?

8 A. I can't recall. That would not -- I
9 mean, it could and never reach me.

10 Q. Right. You're saying it -- it's
11 possible it happened. My question is are you
12 aware of that ever happening?

13 A. I'm not aware of it.

14 (Moore 30(b)(1) Exhibit No. 6, a
15 document Bates-stamped HCPS_00464285 and
16 HCPS_00464285-001 through HCPS_00464285-004, was
17 introduced.)

18 BY MR. KEYES:

19 Q. Okay. Showing you what has been marked
20 as Moore Exhibit 6.

21 This was produced to us with the Bates
22 Numbers HCPS_00464285 through sub-one through
23 sub-four.

24 It's a series of emails. I just had a
25 question for you about the email at the top of

1 the first page.

2 There's an email dated March 15th, 2021.

3 Do you see that?

4 A. Yes, sir.

5 Q. And you say, quote, "As with our
6 firewall and content filter on the enterprise
7 network, the filtering app on the student device
8 reports the sites they visit to the filter's
9 cloud service so appropriate URL blocks can be
10 utilized."

11 Did I read that correctly?

12 A. Yes, sir.

13 Q. And a URL is a website?

14 A. Yes, sir.

15 Q. And when it refers to your firewall
16 and content filter on the enterprise network,
17 "enterprise network" is the Harford County Public
18 Schools network that provides internet access?

19 A. That's correct.

20 Q. And the firewall and content filter is
21 what you described before as being Check Point,
22 Palo Alto, Umbrella or Cisco Securely?

23 A. It would have not included Check Point
24 at the time of this email.

25 Q. I see. That would have been earlier.

1 But -- but the concept of a firewall and
2 content filter would include it?

3 A. That's correct.

4 Q. Okay. Are you drawing a distinction,
5 then, between a filtering app and the internet
6 content filter service?

7 A. No, sir.

8 Q. It's one and the same?

9 A. Correct.

10 Q. Are you describing the mechanism by
11 which it works when you say, "the filtering app
12 on the student device"?

13 A. Say -- say the question one more time.

14 Q. Sure. I'm just trying to understand
15 what you're explaining here. You say, "As with
16 our firewall and content filter on the enterprise
17 network, the filtering app on the student
18 device . . ."

19 A. So --

20 Q. Am I correct in understanding that the
21 filtering app on the student device is part of
22 the internet content filter?

23 A. It is a component of.

24 Q. It's what helps make the filter work?

25 A. It works in tandem --

1 Q. Okay.

2 A. -- with the -- the -- the Palo Alto.

3 Q. Because there there's something on
4 the device that directs the device through the
5 internet content filter; is that correct?

6 A. Let me think about your question.

7 I cannot recall sitting here how
8 Securely does their filtering for us. I do not
9 recall if it's an app or if it's actually -- it
10 must be an app.

11 Q. Okay. What is "BYOT"?

12 A. Bring Your Own Technology. It's our
13 designation for one of our Wi-Fi networks.

14 Q. Are there other Wi-Fi networks that you
15 use?

16 A. Yes.

17 Q. What are the other ones?

18 A. Well, there's -- there's a host of them.
19 There's a --

20 Q. What -- what are the other ones that
21 students can use?

22 A. They have one -- I think it's called
23 HCPS one-to-one.

24 Q. Okay. And was this a program that was
25 used by Harford County Public Schools prior to

1 becoming a one-to-one jurisdiction in October of
2 2020?

3 A. Clarify "program."

4 Q. Was it a -- was it a Wi-Fi network made
5 available to students before October of 2020?

6 A. Which one?

7 Q. The BYOT program.

8 A. Yes.

9 Q. Okay. And so the BYOT program, as
10 I understand it, was a program that allowed or
11 encouraged students to bring their own devices to
12 Harford County Public Schools before they may
13 have had their own school-issued device?

14 A. That is correct.

15 Q. And that's a device that they could then
16 use on school grounds for school purposes?

17 A. That is correct.

18 Q. But in order to use it, it needed
19 network access?

20 A. That's correct.

21 Q. And so there was a BYOT program/network
22 that made that possible?

23 A. Correct.

24 Q. Why did Harford County Public Schools
25 allow or encourage students to bring their own

1 device to school during the school day?

2 MR. LEGG: Objection to form.

3 THE WITNESS: It's my understanding
4 that we were moving to a digital -- digital
5 curriculum. We did not have one-to-one. So,
6 with parameters, we said if the student has a
7 personal device, that they could bring it to the
8 school.

9 We stood up the one -- the BYOT to
10 segment them for security reasons.

11 BY MR. KEYES:

12 Q. Okay. When you say, "to segment them,"
13 you -- you wanted, essentially, a -- a guest
14 network for students to use on their own personal
15 devices rather than the -- the network that was
16 for the school- --

17 A. Production.

18 Q. -- issued devices?

19 A. Yes.

20 Q. And you referred to "production."
21 That's the production network?

22 A. Yeah.

23 Q. And the production network is for
24 internet connectivity for all school-issued
25 devices?

1 A. Yes.

2 Q. Okay.

3 Are you aware of ways in which students
4 can circumvent the BYOT network using their
5 personal devices?

6 A. Yes.

7 Q. One way is just to use cellular, --

8 A. Yes.

9 Q. -- right, so they can get access to the
10 internet without using any internet at all?

11 A. Without any Harford County Public
12 Schools network.

13 Q. Okay. Fair enough.

14 And are there ways where students can
15 circumvent the network on Harford County Public
16 Schools-issued devices?

17 A. Yes.

18 Q. What are those ways?

19 A. So it's a -- a technology called Proxy.

20 Q. Okay. And what is that technology?

21 A. The technology is, basically, a website
22 -- Proxy is a website that allows a individual to
23 go to a website that we've blocked. But it puts,
24 for lack of a better tem, a wrapper around so
25 that the URL passes through our filter. And it's

1 -- it's -- it's, typically, a site that has been
2 uncategorized in the filter which allows that to
3 pass through.

4 Q. Are you able to quantify how many times
5 that's happened?

6 A. No.

7 Q. Do you have any estimate at all how many
8 times it's happened?

9 A. No.

10 Q. How many times has it been reported to
11 you?

12 A. I -- I have no recollection of the
13 number --

14 Q. Okay.

15 A. -- of times.

16 Q. Okay.

17 A. For the -- for the record, this is like
18 a Whac-A-Mole.

19 Q. What do you mean?

20 A. They pop up; we block them. Students
21 find other ones; they might use them. We find
22 it; we block it. It -- it's an ongoing --

23 Q. And so whenever one of these proxies
24 or -- or circumvention methods comes to your
25 attention, you and your staff then block it?

1 A. Correct.

2 Q. But then students find another way?

3 A. Correct.

4 Q. And if that comes to your attention, you
5 block that?

6 A. Correct.

7 Q. And you're blocking these by using the
8 internet content filter?

9 A. Correct.

10 Q. That --

11 A. Well, firewall.

12 Q. Firewall that will then block that
13 proxy?

14 A. Yes.

15 Q. And are there any other steps you think
16 Harford County Public Schools could take to
17 prevent students from using proxies in the
18 first place?

19 MR. LEGG: Objection to form and
20 foundation.

21 THE WITNESS: I am not a -- a firewall
22 designer, so I -- I -- I'm not aware of any.

23 BY MR. KEYES:

24 Q. Have you made any recommendations or
25 suggestions to Harford County Public Schools

1 about other steps the school system could take to
2 block students from using this proxy technology?

3 A. No.

4 Q. Okay. And have you made any
5 recommendations or suggestions to Harford County
6 Public Schools about keeping personal devices out
7 of the schools entirely because students could
8 either use cellular or use proxies to evade the
9 internet content filter?

10 A. I have not made those statements.

11 Q. Have other people, to your knowledge?

12 A. Not to my knowledge.

13 Q. Okay. And so are you able to quantify
14 how often students use cellular when they -- on
15 their personal devices when on school grounds?

16 A. No.

17 MR. KEYES: Okay. Thank you for your
18 time. I don't have any more questions.

19 MR. JAMES: No questions.

20 MR. KEYES: Do -- can they hear me?
21 I hope so.

22 THE VIDEOGRAPHER: You've been on.

23 MR. KEYES: Yeah.

24 Does anyone on the phone have -- or on
25 Zoom have any questions?

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1 MR. LEGG: We're gonna take just, like,
2 a two-minute break, and then we'll come back.

3 MR. KEYES: Sure.

4 THE VIDEOGRAPHER: All right. Stand by.
5 We are off the record at 10:39.

6 (Recess taken.)

7 THE VIDEOGRAPHER: We are on the record
8 at 10:42.

9 MR. LEGG: I have no questions.

10 MR. KEYES: Thank you, Mr. Moore.
11 Appreciate your time today.

12 THE WITNESS: You're welcome.

13 THE VIDEOGRAPHER: All right. Stand by.
14 We are off the record at 10:42. This
15 concludes today's deposition.

16 (Deposition concluded -- 10:42 a.m.)
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I do hereby certify that I am a Notary Public in good standing, that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this _____ day of _____, 2025



Notary Public

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You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

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or substance, if any, noted in the attached
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DATE

SIGNATURE

Subscribed and sworn to before
me this _____ day of _____, 2025.

My commission expires:

Notary Public

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Rule 30

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(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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